

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA : 11 Civ. 4139 (PAC) (FM)

- v. - : ECF Case

THE FOLLOWING DOMAIN NAMES: :

ROJADIRECTA.ORG, and :
ROJADIRECTA.COM, :

Defendants-in-rem. :
:

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**DECLARATION OF CHRISTOPHER D. FREY IN SUPPORT OF
THE GOVERNMENT'S OPPOSITION TO THE MOTION BY
CLAIMANT PUERTO 80 PROJECTS, S.L.U. TO DISMISS THE
VERIFIED COMPLAINT**

I, Christopher D. Frey, declare as follows:

1. I am an Assistant United States Attorney in the Office of the United States Attorney for the Southern District of New York, counsel of record for the United States of America (the "Government") in this matter.

2. Attached hereto as Exhibit A is a true and correct copy of the affidavit of Special Agent Daniel Brazier of the U.S. Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations in support of an application for warrants to seize, among other things, the domain names "rojadirecta.org" and "rojadirecta.com," dated January 31, 2011 in 11 Mag. 262 (S.D.N.Y.).

I declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct.

Dated: New York, New York
August 26, 2011

/s/ Christopher D. Frey
Christopher D. Frey
Assistant United States Attorney
U.S. Attorney's Office for the
Southern District of New York

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

11 MAG 262

UNDER SEAL

UNITED STATES OF AMERICA

- v. -

THE FOLLOWING DOMAIN NAMES:

HQ-STREAMS.COM,
HQ-STREAMS.NET,
ATDHE.NET,
FIRSTROW.NET,
CHANNELSURFING.NET,
ILEMI.COM,
IILEMI.COM,
IILEMII.COM,
ROJADIRECTA.ORG, and
ROJADIRECTA.COM,

AFFIDAVIT IN SUPPORT OF
APPLICATION FOR SEIZURE
WARRANT PURSUANT TO
18 U.S.C. §§
2323(a)(1)(A)-(B), 981(b)

11 Mag.

Defendants in rem.

STATE OF NEW YORK)
COUNTY OF NEW YORK : ss.:
SOUTHERN DISTRICT OF NEW YORK)

DANIEL M. BRAZIER, being duly sworn, deposes and says:

INTRODUCTION

1. I have been a Special Agent with the Department of Homeland Security, Immigration and Customs Enforcement ("ICE") since September 2009. I am currently assigned to the Homeland Security Investigations Department within ICE's Special Agent in Charge - New York Office, where I am assigned to the Intellectual Property Rights Smuggling Group, which is responsible for investigating crimes such as commercial fraud, smuggling, and trafficking in counterfeit goods. Prior to my employment with ICE, I served as a police officer and detective. During the

course of my career in law enforcement, I have received training regarding computer technology and intellectual property offenses, among other things.

2. I am familiar with the information contained in this affidavit based on my review of documents, conversations I have had with other individuals and law enforcement officers about this matter, and my training and experience. Because this affidavit is being submitted for the limited purpose of obtaining seizure warrants, I have not included in this affidavit the details of every aspect of the investigation. Where actions, conversations and statements of others are related herein, they are related in substance and in part, except where otherwise indicated.

3. I make this affidavit in support of the Government's application, pursuant to Title 18, United States Code, Sections 2323(a)(1)(A)-(B) and 981, for warrants to seize the following domain names:

HQ-STREAMS.COM, registered with GoDaddy.com, Inc.,
14455 N. Hayden Rd., Suite 219, Scottsdale, Arizona
85260;

HQ-STREAMS.NET, registered with GoDaddy.com, Inc.,
14455 N. Hayden Rd., Suite 219, Scottsdale, Arizona
85260;

ATDHE.NET, registered with eNom, Inc., 15801 NE 24th
Street, Bellevue, Washington 98008;

FIRSTROW.NET, registered with GoDaddy.com, Inc., 14455
N. Hayden Rd., Suite 219, Scottsdale, Arizona 85260;

CHANNELSURFING.NET, registered with eNom, Inc., 15801 NE 24th Street, Bellevue, Washington 98008;

IILEMI.COM, registered with Directi Internet Solutions Pvt. Ltd., d/b/a PublicDomainRegistry.com, 14525 SW Millikan #48732, Beaverton, Oregon 97005;

IILEMI.COM, registered with Directi Internet Solutions Pvt. Ltd., d/b/a PublicDomainRegistry.com, 14525 SW Millikan #48732, Beaverton, Oregon 97005;

IILEMII.COM, registered with Directi Internet Solutions Pvt. Ltd., d/b/a PublicDomainRegistry.com, 14525 SW Millikan #48732, Beaverton, Oregon 97005;

ROJADIRECTA.ORG, registered with GoDaddy.com, Inc., 14455 N. Hayden Rd., Suite 219, Scottsdale, Arizona 85260; and

ROJADIRECTA.COM, registered with GoDaddy.com, Inc., 14455 N. Hayden Rd., Suite 219, Scottsdale, Arizona 85260;

(the "SUBJECT DOMAIN NAMES").

4. The procedure by which the Government will seize the SUBJECT DOMAIN NAMES, including redirecting them to another website notifying users of the SUBJECT DOMAIN NAMES' seizure, is described in Attachment A hereto and below at paragraphs 42 et seq.

5. As set forth below, there is probable cause to believe that the SUBJECT DOMAIN NAMES are subject to seizure and forfeiture, pursuant to 18 U.S.C. §§ 2323(a)(1)(A)-(B) as property used or intended to be used to commit or facilitate the commission of criminal infringement of copyrights in violation of 18 U.S.C. § 2319.

INTERNET DOMAIN NAMES

6. Based on my training and experience, as well as conversations with other agents, I know the following:

a. A domain name is a simple, easy-to-remember way for humans to identify computers on the Internet. For example, "www.usdoj.gov" and "www.yahoo.com" are domain names.

b. The Domain Name System ("DNS") is, among other things, a hierarchical convention for domain names. Domain names are composed of one or more parts, or "labels," that are delimited by periods, such as "www.example.com." The hierarchy of domains descends from right to left; each label to the left specifies a subdivision, or subdomain, of the domain on the right. The right-most label conveys the "top-level" domain. For example, the domain name "www.example.com" means that the computer assigned that name is in the ".com" top-level domain and the "example" second-level domain, and is a web server (denoted by the "www").

c. DNS servers are computers connected to the Internet that convert domain names that are easy for humans to remember into Internet Protocol ("IP") addresses, which are unique machine-readable numeric addresses that computers use to identify each other on the Internet. An IP address looks like a series of four numbers, each in the range of 0-255, separated by periods (e.g., 121.56.97.178). Every computer connection to the

Internet must be assigned an IP address so that Internet traffic sent from and directed to that computer is directed properly from its source to its destination. DNS servers can be said to "resolve" or "translate" domain names into IP addresses.

d. For each top-level domain (such as ".com"), there is a single company, called a "registry," that determines which second-level domain resolves to which IP address. For example, the registry for the ".net," and ".com" top-level domains is VeriSign, Inc., 487 East Middlefield Road, Mountain View, CA 94043. The registry for the ".org" top-level domain is The Public Interest Registry, 1775 Wiehle Avenue, Suite 200, Reston, VA 20190 and the ".org" top-level domain is administered by Afillas USA, Inc., Building 3, Suite 105, 300 Welsh Road, Horsham, PA 19044.

e. If an individual or business wants to purchase a domain name, they buy it through a company called a "registrar." Network Solutions LLC ("Network Solutions") and GoDaddy.com Inc. ("GoDaddy") are two well-known examples of registrars, although there are hundreds of registrars on the Internet. The registrar, in turn, communicates this purchase to the relevant registry. The individual or business who purchases, or registers, a domain name is called a "registrant."

f. Registrants control the IP address, and thus the computer, to which the domain name resolves. Thus, a registrant

may easily move a domain name to another computer anywhere in the world simply by changing the IP address at the registry.

g. Registries and/or registrars maintain additional information about domain names, including the name and contact information of the registrant.

THE INVESTIGATION

7. This application arises from an ongoing investigation into websites that illegally distribute copyright-protected content by streaming¹ over the Internet live sporting event telecasts and Pay-Per-View events. I know from my training and experience, as well as my participation in the investigation, that illegal streaming of copyrighted content is generally accomplished in one of three ways: (1) individuals capture the output of a television or set-top box and direct that output to a computer, where it is simultaneously and continuously encoded and uploaded in a "stream" to so-called illegal "streaming" websites; (2) individuals hack the authorized Internet streams of international rightsholders and then direct those streams to illegal streaming websites; and (3) a camcorder is pointed at a

¹ "Streaming" refers to a particular method by which media, in particular audio and video files, are delivered to users over the Internet. For purposes of this affidavit, "streamed" media is generally live content that is presented in real time and is generally available at one time only (e.g., during a sporting event).

television or computer screen to capture the programming, which is then encoded and uploaded to illegal streaming websites.

8. I know from my participation in the investigation that the holder of the copyrights in and to all television broadcasts and footage of a particular athletic event is the associated individual sports league. The sports leagues relevant to this affidavit are the National Football League (the "NFL"), the National Basketball Association (the "NBA"), the National Hockey League (the "NHL"), World Wrestling Entertainment (the "WWE") and Ultimate Fighting Championship (the "UFC") (collectively, the "Leagues"). The U.S. Copyright Act, Title 17, United States Code, Sections 101, et seq., gives the holder of such copyrights various exclusive rights, including the right to control public performances and distribution of the works. In turn, the Leagues enter into contractual arrangements with television networks such as NBC and ESPN, which pay the Leagues fees for the rights to broadcast telecasts of their copyrighted sporting events.

9. Based on my participation in the investigation, I know that the Leagues suffer significant negative impact from the unauthorized streaming of live television programming. Among other things, online piracy of live sporting event telecasts threatens the investment that broadcasters and digital media companies are willing to make to distribute live content, the Leagues' ability to sell game tickets and secure local television

and radio carriage, and the value of advertising revenue generated by broadcast, radio and new media partners. Moreover, with respect to Pay-Per-View events, it is estimated that millions of dollars in revenue are lost by copyright holders each year from the illegal streaming of their content over the Internet through such websites, which enables unauthorized viewers to watch the event live in the same quality and with the same ease as those who lawfully purchased the content through Pay-Per-View.

10. In response to such piracy, both the Leagues and the broadcasting networks invest significant amounts to monitor such rampant acts of theft and provide notices to Internet service providers and website operators to take down illegally posted content. As demonstrated below, these take down notices are often ineffective, yet the costs of these efforts are passed on to sports fans and consumers when they purchase tickets or subscribe to sports networks.

11. Based on my participation in the investigation, I have learned that the problem of piracy of live sports broadcasting over the Internet is particularly pernicious in light of the fact that the value of the of the copyright holder's content is extremely perishable. There is significant value to consumers of being able to access that content while the event is still in progress. Indeed, unlike other video content offered online,

including television programs and motion pictures, which often remain popular well after its debut, sports fans' interest in viewing live sporting events is greatest while the event is happening. In addition, some sporting events - such as wrestling and boxing - involve bouts that can be over in a matter of a few minutes. Thus, even if a website is notified by a copyright holder of the infringement and takes the infringing content down within 15 minutes, the damage is already done because the pirated telecast has already been seen and all of the value of the live content has been extracted.

12. Many of the websites that are involved in the illegal distribution of copyright-protected content over the Internet may be divided into two classes: "linking" websites and "cyberlocker" websites.² All of the SUBJECT DOMAIN NAMES are "linking" websites.

13. I know from my participation in the investigation that "linking" websites generally collect and catalog links³ to files

² "Cyberlocker" websites allow users to upload infringing content and often feature high-capacity data connections that allow users conveniently to download or stream that content relatively quickly. Cyberlocker websites also may allow users to search for and download specific content directly without first going through a linking site. Finally, a cyberlocker may use different servers to host its webpage, receive uploads, and handle downloading or streaming content. Each computer server connected to the Internet is identified by one or more IP addresses.

³ For purposes of this affidavit, a "link" is code which specifies a particular webpage or file on the Internet. If

on third party websites that contain illegal copies of copyrighted content, including sporting events and Pay-Per-View events. Linking websites organize these links by, for example, sports type or sporting event, to make them easily accessible. Users simply click on a link to begin the process of downloading or streaming to their own computer an illegal broadcast of a sporting event or Pay-Per-View event from the third party website that is hosting the stream. Linking websites are popular because they allow users to quickly browse content and locate illegal streams that would otherwise be more difficult to find through manual searches of the Internet. Linking websites also often allow users to post links to infringing content.

14. The investigation has identified ten linking websites that are among the most popular such websites on the Internet for illegally distributing copyrighted sporting events and/or Pay-Per-View events. These websites are: (1) Hq-Streams.com; (2) Hq-Streams.net; (3) Atthe.net; (4) Firstrow.net; (5) Channelsurfing.net; (6) Ilemi.com; (7) Iilemi.com; (8) Iilemii.com; (9) Rojadirecta.org; and (10) Rojadirecta.com.

clicked on by a user, a link can, for example, bring up the relevant web page in an Internet browser or run a program. For example, "<http://movies.nytimes.com/2010/06/18/movies/18toy.html?scp=1&sq=toy%20story%203&st=cse>" is a link to a webpage containing the New York Times' review of the movie "Toy Story 3." A "link" may also be referred to as a "Uniform Resource Locator" or "URL."

PROBABLE CAUSE FOR SEIZURE AND FORFEITURE

15. During the course of the investigation I and other ICE agents have reviewed the below linking sites using computers located in the borough of Manhattan in New York, New York, as well as in Westchester County, New York, and have used those websites to stream portions of copyrighted broadcasts of sporting events and/or Pay-Per-View events.

The Hq-Streams.com and Hq-Streams.net Websites

16. Based on my review of webpages that are available at the Hq-Streams.com and the Hq-Streams.net websites, I have learned the following:

a. When an Internet user accesses either the Hq-Streams.com website or the Hq-Streams.net website, that user is directed to a main page, which is the same for either of the URLs and which carry the same IP address. Regardless of whether the user has typed "Hq-Streams.com" or "Hq-Streams.net" to access the website, the URL displayed by the main page is always "Hq-Streams.com" (hereafter, the website will be referred to as "Hq-Streams"). Hq-Streams is a "linking" website dedicated to wrestling. The website's main page requires the user to set up an account, albeit at no cost. After the user creates an account and logs in, the user is brought to the homepage, upon which there are eleven categories of links to various chat rooms and live streams of broadcast or Pay-Per-View wrestling events. (A

copy of the Hq-Streams homepage as it appeared on or about January 31, 2011 is attached as Exhibit A). These live streams are either of wrestling matches that are being telecast in that particular moment in time by a certain broadcaster, or were previously recorded and are being played on a continuous loop.

b. The Hq-Streams website houses numerous "channels," each displaying various wrestling and Pay-Per-View events that change on a daily basis. On or about January 24, 2011, for example, Channels 1-5 and Channel 9 were streaming previous wrestling matches from WWE, and Channels 6-8 and Channel 10 were off air. Based on my conversations with representatives of the WWE, I know that as of January 24, 2011, all of the wrestling events offered on this website were copyrighted, and that the copyright holders did not authorize their third party distribution over the Internet by Hq-Streams.

c. By selecting one of the channels available on the Hq-Streams website, an embedded video displays a wrestling program, whose content is running on a stream from another website and is linked to the Hq-Streams website. Because the sporting event is running on a live stream, a user watches from whatever point in the stream the sporting event is currently running.

d. During the streaming event, advertisements are periodically displayed at the bottom of the video. Depending on

the chosen link, a viewer may be required to view an advertisement before viewing the selected sporting event. I know from my participation in the investigation that companies which place advertisements on a website typically pay a fee to the website's owner based on, among other things, the number of website users who view the ad, as well as the number of times users click on the ad. Both of these figures depend on, among other things, the website's popularity and its overall number of users.

e. In addition to revenue generated by advertisements, the Hq-Streams website also profits by offering its users the option of purchasing an "elite stream." If purchased, the website claims that there will be "no lag time and no shutdowns streamed from [the website's] private servers." A three-day pass costs \$3.00, a one month pass costs \$12.00, and a three month pass costs \$25.00.

f. Based on my review of public records, I know that the Hq-Streams.com and Hq-Streams.net websites are hosted on a computer assigned the IP address 85.17.120.217, which is hosted at an Internet Service Provider in the Netherlands.

Captures of Infringing Content Via Hq-Streams.com

17. I have spoken with other ICE agents who have used the Hq-Streams.com website to stream illegal telecasts of sporting events and/or Pay-Per-View events. According to the agents, on

or about the dates listed in the chart below, they clicked on links for the below-listed events on the Hq-Streams.com website, and streamed portions of the selected events in a manner that indicated that the entire event had been made available to users⁴ (the "Captures").

Date	Event Viewed	Duration of Captures
January 14, 2011	Channel 1: WWE Smackdown	0 hr 10 min 12 sec
January 14, 2011	Channels 2-5: TNA Impact!	0 hr 02 min 39 sec
January 14, 2011	Channel 6: Extreme Championship Wrestling	0 hr 06 min 18 sec
January 14, 2011	Channel 1: WWE Smackdown	0 hr 18 min 13 sec
January 19, 2011	Channel 2: WWE Royal Rumble	0 hr 23 min 59 sec
January 19, 2011	Archive (12/05/10): TNA Final Resolution	0 hr 31 min 27 sec
January 19, 2011	Archive (01/09/11): TNA Genesis	0 hr 17 min 44 sec
January 19, 2011	Archive (12/16/10): TNA Reaction	0 hr 10 min 59 sec
January 19, 2011	Archive: WWE NXT	0 hr 13 min 14 sec
January 19, 2011	Channel 7: WWE Raw	0 hr 26 min 30 sec
January 19, 2011	Archive (01/17/11): WWE Raw	0 hr 19 min 12 sec
January 19, 2011	Archive: WWE Royal Rumble 2011	0 hr 21 min 47 sec
January 19, 2011	Channel 1: WWE Smackdown	0 hr 18 min 09 sec
January 19, 2011	Archive (01/07/11): WWE Smackdown	0 hr 17 min 10 sec
January 19, 2011	Archive (12/16/10): WWE Superstars	0 hr 04 min 30 sec
January 19, 2011	Archive (12/30/10): WWE Superstars	0 hr 18 min 55 sec

⁴ Agents involved in the investigation viewed portions of the stream at various intervals during the event, rather than the entirety of the stream.

18. Based on my conversations with representatives of WWE, I know that as of January 25, 2011, all of the aforementioned events were copyrighted, and that the copyright holders did not authorize their third party distribution over the Internet by Hq-Streams.com.

Captures of Infringing Content Via Hq-Streams.net

19. I have spoken with other ICE agents who have used the Hq-Streams.net website, redirected to the Hq-Streams.com main page, to stream illegal telecasts of sporting events and/or Pay-Per-View events. According to the agents, on or about the dates listed in the chart below, they clicked on links for the below-listed events on the Hq-Streams.com website, after initially entering the Hq-Streams.net website address, and streamed portions of the selected events in a manner that indicated that the entire event had been made available to users.

Date	Event Viewed	Duration of Captures
January 19, 2011	Archive (01/17/11): WWE Raw	0 hr 17 min 07 sec
January 19, 2011	Channel 2: WWE Royal Rumble	0 hr 15 min 18 sec

20. Based on my conversations with representatives of WWE, I know that as of January 25, 2011, all of the aforementioned events were copyrighted, and that the copyright holders did not authorize their third party distribution over the Internet by Hq-Streams.net.

The Atdhe.net Website

21. Based on my review of webpages that are available at the Atdhe.net website, I have learned the following:

a. Atdhe.net is a "linking" website. When users access the Atdhe.net website, they are brought to the homepage, which provides links to certain television and movie content, as well as daily live sporting and Pay-Per-View events. (Copies of portions of the Atdhe.net homepage as it appeared on or about January 31, 2011 are attached as Exhibit B). Once a user selects a link, that user is taken to a new window. An advertisement video plays before a user can view the selected program. Because the event runs on a live stream, the user watches from whatever point in the stream the broadcast is presently at.

b. On or about December 20, 2010, for example, when agents involved in the investigation selected a link for the sporting event entitled "Chicago Bears vs. Minnesota Vikings," a new window opened and the broadcast of that NFL game began to stream live in the window, the top of which displayed "ATDHE.NET, You are watching Chicago Bears vs. Minnesota Vikings, NFL Week 15." Based on my conversations with representatives of the NFL, I know that as of December 20, 2010, this football game was copyrighted, and the NFL did not authorize the third party distribution of that sporting event over the Internet by Atdhe.net.

c. Several broadcasting networks are also listed as links on the Atdhe.net webpage. For example, on or about December 22, 2010, the following links were listed: MSNBC, CNBC, ESPN and NFL Network. On or about December 22, 2010, at approximately 9:48 a.m. EST, when agents involved in the investigation selected the MSNBC link, a live stream video appeared of the current programming that was being played on an authorized broadcast of MSNBC, on that particular date at that particular time. Based on my conversations with representatives of MSNBC, I know that as of December 22, 2010, MSNBC had not authorized third party distribution over the Internet of its broadcasts by Atdhe.net.

d. The links displayed on the Atdhe.net website for various live sporting and Pay-Per-View events changes on a daily basis. The links for sporting events are added as the day progresses and the events' starting times are closer. The links are displayed with the starting time (Eastern Standard Time) for each of the events to the left of the link. Several of the live sporting events listed often have more than one link displayed.

e. Under the heading "Terms of Service," the Atdhe.net website displays the following, among other things:

We DO NOT host any videos on this website. All videos found on our site are found freely available around the web on sites such as Justin.tv, Ustream.tv, Selfcast, etc. We make no guarantees or promises in our service and take no liability for our users actions.

We are not affiliated nor claim to be affiliated with any of the owners of videos/streams played on our site. All content is copyright of their respective owners.

We urge all copyright owners, to recognize that links contained within this site are located somewhere else on the web. The embedded link points to the location of the video on the web. Please direct all copyright infringement issues to the companies that host these files (Justin.tv, Ustream.tv, Freedocast, etc.).

Also found under the "Terms of Service" header is a section entitled "Liabilities," which states, in pertinent part:

The material on the website is designed to comply with Swedish law and we cannot be held responsible for any non-compliance with applicable local laws in any other jurisdiction.

22. I have reviewed Alexa.com rankings for the Atdhe.net website, and I have learned that as of on or about January 27, 2011, Alexa.com ranked the Atdhe.net website as the 664th most popular website in the world, and the 517th most popular website in the United States.⁵ According to Compete.com, the number of unique visitors to Atdhe.net has increased from approximately

⁵ Alexa.com is a "web traffic metric service," meaning that it performs a function similar to the traditional Nielsen television ratings service. Among other things, Alexa.com measures the amount of visitors to a particular website relative to other websites on the Internet, provides an overall ranking of the website's popularity, and collects other information relating to the website, including the number of other websites that link to it.

365,308 per month in or about February 2010 to approximately 1,552,175 in or about December 2010.⁶

23. Based on my review of public records, I know that the Atdhe.net website is hosted on a computer assigned the IP address 88.80.11.29, which is located at an Internet Service Provider in Sweden.

Captures of Infringing Content Via Atdhe.net

24. I have used the Atdhe.net website to stream illegal telecasts of sporting events and/or Pay-Per-View events. On or about the dates listed in the chart below, I personally clicked on links for the below-listed events on the Atdhe.net website, and streamed portions of the selected events in a manner that indicated that the entire event had been made available to users.

Date	League	Event Viewed	Duration of Captures
December 12, 2010	NFL	Bengals vs. Steelers	1 hr 28 min 12 sec 0 hr 59 min 57 sec
December 12, 2010	NFL	Dolphins vs. Jets	0 hr 19 min 51 sec
December 13, 2010	NFL	Giants vs. Vikings	0 hr 04 min 09 sec
December 14, 2010	NHL	Penguins vs. Flyers	0 hr 09 min 51 sec 0 hr 10 min 10 sec 0 hr 13 min 16 sec 0 hr 12 min 04 sec 0 hr 09 min 51 sec
December 15, 2010	NBA	Knicks vs. Boston	0 hr 09 min 16 sec 0 hr 08 min 05 sec 0 hr 06 min 23 sec 0 hr 10 min 27 sec

⁶ Compete.com is a web page analytics service that tracks consumer behavior on the Internet, including the number of unique visitors to a particular website from month to month.

Date	League	Event Viewed	Duration of Captures
December 15, 2010	NHL	Rangers vs. Penguins	0 hr 10 min 57 sec 0 hr 05 min 47 sec 0 hr 10 min 49 sec
December 16, 2010	NBA	Nets vs. Wizards	0 hr 09 min 09 sec 0 hr 09 min 18 sec 0 hr 06 min 38 sec 0 hr 10 min 20 sec
December 16, 2010	NFL	49ers vs. Chargers	0 hr 08 min 46 sec 0 hr 04 min 58 sec 0 hr 06 min 55 sec 0 hr 06 min 01 sec
December 16, 2010	NHL	Islanders vs. Ducks	0 hr 10 min 31 sec 0 hr 08 min 07 sec 0 hr 04 min 46 sec
December 19, 2010	WWE	Pay-Per-View TLC	0 hr 06 min 46 sec 0 hr 05 min 48 sec 0 hr 06 min 49 sec 0 hr 06 min 33 sec
December 20, 2010	NFL	Bears vs. Vikings	0 hr 06 min 26 sec 0 hr 06 min 11 sec 0 hr 06 min 00 sec 0 hr 05 min 13 sec
December 28, 2010	NBA	Knicks vs. Heat	0 hr 10 min 33 sec 0 hr 10 min 21 sec 0 hr 10 min 38 sec 0 hr 09 min 48 sec
December 28, 2010	NFL	Eagles vs. Vikings	0 hr 11 min 43 sec 0 hr 05 min 36 sec 0 hr 09 min 43 sec 0 hr 11 min 23 sec
January 1, 2011	UFC	Pay-Per-View 125	0 hr 06 min 57 sec 0 hr 06 min 09 sec 0 hr 06 min 17 sec 0 hr 03 min 10 sec
January 6, 2011	NHL	Penguins vs. Lightning	0 hr 08 min 16 sec 0 hr 06 min 49 sec 0 hr 06 min 10 sec

25. Based on my conversations with representatives of the NFL, NBA, NHL, WWE and UFC, I know that as of January 25, 2011, all of the aforementioned events were copyrighted, and that the

copyright holders did not authorize their third party distribution over the Internet by Atdhe.net.

The Firstrow.net Website

26. Based on my review of webpages that are available at the Firstrow.net website, I have learned the following:

a. Firstrow.net is a "linking" website. When users access the Firstrow.net website, they are brought to the homepage, which provides various links to television sports channels, daily live sporting events, and Pay-Per-View events. Numerous advertisements are present in various locations on the homepage as well. (Copies of portions of the Firstrow.net homepage as it appeared on or about January 31, 2011 are attached as Exhibit C). Links to the following sports are displayed on the Firstrow.net homepage: Football, American Football, Basketball, Ice Hockey, Boxing - WWE - UFC, Tennis, Motorsport, Rugby, Darts, Snooker, Golf, Aussie Rules, and Handball. The website's various live sporting events, television programs, movie channel and Pay-Per-View events all change on a daily basis. Moreover, each sport-specific link is also updated daily.

b. On the top of the homepage, the words "FIRST ROW" appear and there are eight links displayed underneath. When a user clicks one of the sport specific links (e.g., football), the sport appears with that day's schedule and the words, "In this section you can see football live and free." When a program is

selected, the content begins to run; because the event runs on a live stream, the user watches from whatever point in the stream the broadcast is presently at.

c. On January 3, 2011, when agents involved in the investigation selected a link for "1/03/2011 National Hockey League (NHL) Boston Bruins vs. Toronto Maple Leafs," a new window opened and the broadcast of that NHL game began to stream live in the window, the top of which displayed, "FIRSTROW.NET." Based on my conversations with representatives of the NHL, I know that as of January 3, 2011, this hockey game was copyrighted, and the NHL did not authorize the third party distribution of that sporting event over the Internet by Firstrow.net.

d. In addition, on or about January 14, 2011, at approximately 1:45 p.m. EST, when agents involved in the investigation selected a Fox News TV channel link, a live stream video appeared of the current programming that was being played on an authorized broadcast of Fox News, on that particular date at that particular time. Advertisements were periodically displayed at the bottom of the video, as the user viewed the live stream. Based on my conversations with representatives of Fox News, I know that as of January 14, 2011, Fox News had not authorized third party distribution over the Internet of its broadcasts by Firstrow.net.

27. Based on my review of publically available records, I know that the Firstrow.net website is hosted on a computer server assigned IP address 80.67.5.103, which is hosted at an Internet Service Provider in Sweden.

Captures of Infringing Content Via Firstrow.net

28. I have used the Firstrow.net website to stream illegal telecasts of sporting events and/or Pay-Per-View events. On or about the dates listed in the chart below, I personally clicked on links for the below-listed events on the Firstrow.net website, and streamed portions of the selected events in a manner that indicated that the entire event had been made available to users.

Date	League	Event Viewed	Duration of Captures
December 11, 2010	UFC	Pay-Per-View 124	1 hr 34 min 39 sec
December 14, 2010	NBA	Timberwolves vs. Warriors	0 hr 01 min 58 sec 0 hr 14 min 43 sec 0 hr 19 min 55 sec 0 hr 22 min 08 sec 0 hr 13 min 32 sec
December 14, 2010	NHL	Penguins vs. Flyers	0 hr 12 min 42 sec 0 hr 27 min 02 sec 0 hr 15 min 33 sec 0 hr 16 min 52 sec 0 hr 15 min 52 sec 0 hr 04 min 04 sec
December 15, 2010	NBA	Celtics vs. Knicks	0 hr 16 min 00 sec 0 hr 13 min 44 sec 0 hr 10 min 50 sec 0 hr 13 min 06 sec
December 15, 2010	NHL	Rangers vs. Penguins	0 hr 12 min 56 sec 0 hr 11 min 53 sec 0 hr 14 min 36 sec
December 16, 2010	NBA	Wizards vs. Nets	0 hr 11 min 54 sec 0 hr 15 min 30 sec 0 hr 18 min 41 sec

Date	League	Event Viewed	Duration of Captures
December 16, 2010	NFL	49ers vs. Chargers	0 hr 10 min 41 sec 0 hr 20 min 47 sec 0 hr 31 min 29 sec 0 hr 13 min 16 sec
December 16, 2010	NHL	Islanders vs. Ducks	0 hr 14 min 22 sec 0 hr 23 min 03 sec 0 hr 16 min 16 sec
December 19, 2010	NFL	Falcons vs. Seahawks	0 hr 08 min 08 sec 0 hr 08 min 22 sec 0 hr 07 min 06 sec
December 19, 2010	WWE	Pay-Per-View TLC	0 hr 06 min 35 sec 0 hr 06 min 54 sec 0 hr 05 min 34 sec 0 hr 01 min 38 sec
December 20, 2010	NFL	Bears vs. Vikings	0 hr 12 min 37 sec 0 hr 12 min 20 sec 0 hr 13 min 37 sec 0 hr 11 min 17 sec
December 28, 2010	NBA	Knicks vs. Heat	0 hr 11 min 59 sec 0 hr 11 min 27 sec 0 hr 07 min 04 sec 0 hr 08 min 00 sec
December 28, 2010	NFL	Eagles vs. Vikings	0 hr 09 min 43 sec 0 hr 08 min 24 sec 0 hr 08 min 11 sec 0 hr 09 min 22 sec
December 28, 2010	NHL	Rangers vs. Devils	0 hr 06 min 16 sec 0 hr 07 min 54 sec 0 hr 09 min 02 sec
January 1, 2011	UFC	Pay-Per-View 125	0 hr 06 min 17 sec 0 hr 06 min 42 sec 0 hr 06 min 36 sec
January 3, 2011	NHL	Bruins vs. Maple Leafs	0 hr 07 min 38 sec 0 hr 06 min 19 sec 0 hr 06 min 06 sec
January 3, 2011	WWE	Monday Night Raw	0 hr 10 min 17 sec 0 hr 06 min 52 sec
January 5, 2011	NHL	Penguins vs. Lightning	0 hr 16 min 22 sec 0 hr 09 min 43 sec 0 hr 08 min 11 sec

29. Based on my conversations with representatives of the UFC, NBA, NHL, NFL, and WWE, I know that as of January 25, 2011,

all of the aforementioned events were copyrighted, and that the copyright holders did not authorize their third party distribution over the Internet by Firstrow.net.

The Channelsurfing.net Website

30. Based on my review of webpages that are available at the Channelsurfing.net website, I have learned the following:

a. Channelsurfing.net is a "linking" website. When a user accesses the Channelsurfing.net website, the user is brought to the homepage, which provides links to television and movie content, as well as daily live sporting events and Pay-Per-View events. (Copies of portions of the Channelsurfing.net homepage as it appeared on or about January 31, 2011 are attached as Exhibit D). In addition, numerous advertisements are displayed on various locations of the homepage.

b. On a day-to-day basis, the links for some of the television programs and broadcast channels change very little. In fact, the following appear to be listed on a consistent, daily basis: "South Park," "The Office," "The Poker Channel," "ESPN," "MSNBC," "CNBC," and "Fox News." Each of these links have the word "live" displayed adjacent to the link and the logo for the corresponding network or television show is also displayed. By selecting one of these links, the user is taken to a new Channelsurfing.net window, which displays the selected television content or program. Because the content is running on a live

stream from another website, the selected show does not start at the beginning of the program, but rather runs from whatever point in the stream the show is presently at. In addition, advertisements are periodically displayed at the bottom of the video during the live stream; these advertisements are separate and distinct from any commercials that may appear during the stream of the sporting event broadcast.

c. In addition, a number of the links displayed on the Channelsurfing.net webpage for various live sporting events, television programs, and Pay-Per-View events change on a daily basis. The links for sporting events are added as the day progresses and an event's starting time draws closer. To the left of each of the sporting events or television programs is the corresponding league or broadcast company logo, including "NBC," "CBS," "ABC," "ESPN," "NHL," "NBA," and "NCAA." The logos and Eastern Standard broadcast times appear to be accurate for the programming on that particular day.

d. For example, on or about January 5, 2011, at approximately 4:28 p.m. EST, when agents involved in the investigation selected an MSNBC channel link, a live stream video appeared of the current programming that was being played on an authorized broadcast of MSNBC, on that particular date at that particular time. Based on my conversations with representatives of MSNBC, I know that as of January 5, 2011, MSNBC had not

authorized third party distribution over the Internet of its broadcasts by Channelsurfing.net.

e. Also, by way of example, on January 1, 2011, when agents involved in the investigation selected a link for "UFC - Resolution 10:00 PM EST 1/1," a new window opened and the Pay-Per-View broadcast of that UFC match began to stream live in the window, the top of which displayed, "UFC 125 - WWW.CHANNELSURFING.NET." Based on my conversations with representatives of the UFC, I know that as of January 1, 2011, this match was copyrighted, and the UFC did not authorize the third party distribution of that Pay-Per-View match over the Internet by Channelsurfing.net.

f. Under the heading "Terms of Service," the Channelsurfing.net website displays the following, among other things:

We DO NOT host any videos on this website. All videos found on our site are found freely available around the web on sites such as Justin.tv, Ustream.tv, Selfcast, etc. We make no guarantees or promises in our service and take no liability for our users actions. We are not affiliated nor claim to be affiliated with any of the owners of videos/streams played on our site. All content is copyright of their respective owners.

We urge all copyright owners, to recognize that links contained within this site are located somewhere else on the web. The embedded link points to the location of the video on the web. Please direct all copyright infringement issues to the

companies that host these files (Justin.tv, Ustream.tv, Freedocast, etc.).

Also found under the "Terms of Service" header is a section entitled "Liabilities," which states, in pertinent part:

The material on the website is designed to comply with Swedish law and we cannot be held responsible for any non-compliance with applicable local laws in any other jurisdiction.

g. I know from public records that the Channelsurfing.net website is hosted on a computer assigned the IP address 89.248.174.98, which is hosted at an Internet Service Provider in the Netherlands.

Captures of Infringing Content Via Channelsurfing.net

31. I have used the Channelsurfing.net website to stream illegal telecasts of sporting events and/or Pay-Per-View events. On or about the dates listed in the chart below, I personally clicked on links for the below-listed events on the Channelsurfing.net website, and streamed portions of the selected events in a manner that indicated that the entire event had been made available to users.

Date	League	Event Viewed	Duration of Captures
December 11, 2010	UFC	Pay-Per-View 124	1 hr 16 min 00 sec
December 12, 2010	NFL	Bengals vs. Steelers	1 hr 25 min 00 sec 1 hr 03 min 00 sec
December 14, 2010	NBA	Warriors vs. Timberwolves	0 hr 13 min 02 sec 0 hr 15 min 20 sec 0 hr 16 min 01 sec 0 hr 15 min 50 sec

Date	League	Event Viewed	Duration of Captures
December 14, 2010	NHL	Penguins vs. Flyers	0 hr 17 min 07 sec 0 hr 08 min 30 sec 0 hr 13 min 12 sec 0 hr 09 min 35 sec 0 hr 13 min 16 sec 0 hr 15 min 02 sec
December 15, 2010	NBA	Knicks vs. Celtics	0 hr 11 min 33 sec 0 hr 12 min 57 sec 0 hr 07 min 38 sec 0 hr 11 min 23 sec
December 15, 2010	NHL	Rangers vs. Penguins	0 hr 10 min 32 sec 0 hr 08 min 36 sec 0 hr 01 min 17 sec
December 16, 2010	NBA	Nets vs. Wizards	0 hr 12 min 48 sec 0 hr 10 min 09 sec 0 hr 10 min 26 sec 0 hr 13 min 38 sec
December 16, 2010	NHL	Islanders vs. Ducks	0 hr 12 min 44 sec 0 hr 10 min 27 sec 0 hr 06 min 26 sec
December 19, 2010	NFL	Jaguars vs. Colts	0 hr 10 min 20 sec 0 hr 05 min 15 sec
December 19, 2010	WWE	Pay-Per-View TLC	0 hr 06 min 11 sec 0 hr 06 min 22 sec 0 hr 07 min 44 sec
December 20, 2010	NFL	Vikings vs. Bears	0 hr 09 min 25 sec 0 hr 11 min 33 sec 0 hr 12 min 30 sec 0 hr 07 min 16 sec
December 28, 2010	NBA	Knicks vs. Heat	0 hr 13 min 00 sec 0 hr 10 min 51 sec 0 hr 07 min 43 sec 0 hr 08 min 51 sec
December 28, 2010	NFL	Eagles vs. Vikings	0 hr 28 min 59 sec 0 hr 13 min 34 sec 0 hr 20 min 24 sec
December 29, 2010	NHL	Islanders vs. Penguins	0 hr 07 min 15 sec 0 hr 11 min 18 sec 0 hr 11 min 15 sec
January 1, 2011	UFC	Pay-Per-View 125	0 hr 09 min 38 sec 0 hr 06 min 42 sec 0 hr 06 min 08 sec
January 3, 2011	NHL	Bruins vs. Maple Leafs	0 hr 07 min 29 sec 0 hr 06 min 35 sec 0 hr 06 min 20 sec

Date	League	Event Viewed	Duration of Captures
January 3, 2011	WWE	Monday Night Raw	0 hr 13 min 03 sec 0 hr 10 min 58 sec

32. Based on my conversations with representatives of UFC, NFL, NBA, NHL, and WWE, I know that as of January 25, 2011, all of the aforementioned events were copyrighted, and that the copyright holders did not authorize their third party distribution over the Internet by Channelsurfing.net.

The Ilemi.com, Iilemi.com, and Iilemii.com Websites

33. Based on my review of webpages that are available at the Ilemi.com, the Iilemi.com, and Iilemii.com websites, I have learned the following:

a. When an Internet user accesses the Ilemi.com website, the Iilemi.com website, or the Iilemii.com website, that user is directed to a main page, which is the same for all of the URLs and which carry the same IP address. Regardless of whether the user has typed "Ilemi.com," "Iilemi.com," or "Iilemii.com" to access the website, the URL displayed by the main page is always "Ilemi.com". (hereafter, the website will be referred to as "Ilemi"). Ilemi is a "linking" website. When a user accesses the Ilemi website, the user is brought to the homepage, which provides links to television and movie content, as well as daily live sporting events and Pay-Per-View events. In addition, numerous advertisements are displayed in various locations of the homepage. (Copies of portions of the Ilemi

homepage as it appeared on or about January 31, 2011 are attached as Exhibit E).

b. On a day-to-day basis, the links for some of the television programs and broadcast channels change very little. In fact, the following appear to be listed on a consistent, daily basis: "Movie Channel," "Canal de Peliculas," "ESPN," "ESPN Deportes," "The Office," "House," "MSNBC," "South Park," "Telefe," "UFC Channel," "Poker Channel," "NFL Network." In addition, at the top of the homepage, the words "Live Sports Free" appear and five links are displayed under these words. Three of those links include the word "live" displayed prominently next to the link. By selecting one of these links, the user is taken to a new Ilemi window, which displays the selected television content or program. Because the content is running on a live stream from another website, the selected show does not start at the beginning of the program, but rather runs from whatever point in the stream the show is presently at. In addition, advertisements are periodically displayed at the bottom of the video during the live stream; these advertisements are separate and distinct from any commercials that may appear during the stream of the sporting event broadcast.

c. On or about January 1, 2011, for example, when agents involved in the investigation selected a link for the Pay-Per-View event entitled "UFC - Resolution 04:00 CET

1/1/2011," a new window opened and the Pay-Per-View broadcast of that UFC match began to stream live in the window, the top of which displayed, "ILEMI.COM, You Are Watching UFC 125: Resolution - UFC PPV." Based on my conversations with representatives of the UFC, I know that as of January 1, 2011, this match was copyrighted, and the UFC did not authorize the third party distribution of that Pay-Per-View event over the Internet by the Ilemi website.

d. Several broadcasting networks are also listed as links on the Ilemi website. For example, on or about January 6, 2011, at approximately 2:40 p.m. EST, when agents involved in the investigation selected an MSNBC link, a live stream video appeared of the current programming that was being played on an authorized broadcast of MSNBC, on that particular date at that particular time. Based on my conversations with representatives of MSNBC, I know that as of January 6, 2011, MSNBC had not authorized third party distribution over the Internet of its broadcasts by the Ilemi website.

e. The links displayed on the Ilemi website for various live sporting events, television programs, a movie channel, and Pay-Per-View events change on a daily basis. The links and times for sporting events are added as the day progresses. The broadcast times appear to be accurate for the programming on that particular day.

f. Under the heading "Terms of Service," the Ilemi website displays the following, among other things:

We DO NOT host any videos on this website. All videos found on our site are found freely available around the web on sites such as Justin.tv, Ustream.tv, Selfcast, etc. We make no guarantees or promises in our service and take no liability for our users actions. We are not affiliated nor claim to be affiliated with any of the owners of videos/streams played on our site. All content is copyright of their respective owners.

We urge all copyright owners, to recognize that links contained within this site are located somewhere else on the web. The embedded link points to the location of the video on the web. Please direct all copyright infringement issues to the companies that host these files (Justin.tv, Ustream.tv, Freedocast, etc.).

Also found under the "Terms of Service" header is a section entitled "Liabilities," which states, in pertinent part:

The material on the website is designed to comply with Swedish law and we cannot be held responsible for any non-compliance with applicable local laws in any other jurisdiction.

g. Based on my review of public records, I know that the Ilemi.com, the Iilemi.com, and the Iilemii.com websites are hosted on a computer assigned the IP address 80.67.12.50, which is hosted at an Internet Service Provider in Sweden.

Captures of Infringing Content Via Ilemi.com

34. I have used the Ilemi.com website to stream illegal telecasts of sporting events and/or Pay-Per-View events. On or

about the dates listed in the chart below, I personally clicked on links for the below-listed events on the Ilemi.com website, and streamed portions of the selected events in a manner that indicated that the entire event had been made available to users.

Date	League	Event Viewed	Duration of Captures
December 16, 2010	NBA	Wizards vs. Nets	0 hr 05 min 09 sec 0 hr 06 min 35 sec 0 hr 06 min 40 sec
December 16, 2010	NFL	49ers vs. Chargers	0 hr 05 min 43 sec 0 hr 02 min 16 sec 0 hr 06 min 24 sec
December 16, 2010	NHL	Islanders vs. Ducks	0 hr 04 min 55 sec 0 hr 05 min 29 sec
December 19, 2010	NFL	Jaguars vs. Colts	0 hr 07 min 09 sec 0 hr 08 min 09 sec 0 hr 06 min 47 sec
December 19, 2010	WWE	Pay-Per-View TLC	0 hr 06 min 12 sec 0 hr 06 min 56 sec 0 hr 06 min 03 sec
December 28, 2010	NBA	Knicks vs. Heat	0 hr 10 min 32 sec 0 hr 09 min 45 sec 0 hr 08 min 43 sec
December 28, 2010	NFL	Eagles vs. Vikings	0 hr 10 min 53 sec 0 hr 10 min 05 sec 0 hr 07 min 17 sec
December 28, 2010	NHL	Rangers vs. Devils	0 hr 12 min 25 sec 0 hr 09 min 37 sec 0 hr 08 min 09 sec
January 1, 2011	UFC	Pay-Per-View 125	0 hr 06 min 31 sec 0 hr 07 min 20 sec 0 hr 06 min 29 sec
January 3, 2011	NHL	Bruins vs. Maple Leafs	0 hr 07 min 35 sec 0 hr 06 min 51 sec 0 hr 08 min 08 sec
January 3, 2011	WWE	Monday Night Raw	0 hr 09 min 11 sec 0 hr 08 min 27 sec
January 4, 2011	NHL	Lightning vs. Capitals	0 hr 06 min 48 sec 0 hr 06 min 18 sec 0 hr 07 min 16 sec

Date	League	Event Viewed	Duration of Captures
January 4, 2011	NBA	Spurs vs. Knicks	0 hr 06 min 15 sec 0 hr 06 min 29 sec 0 hr 06 min 33 sec 0 hr 06 min 41 sec
January 5, 2011	NBA	Nets vs. Bulls	0 hr 08 min 42 sec 0 hr 05 min 41 sec 0 hr 08 min 51 sec 0 hr 06 min 39 sec

35. Based on my conversations with representatives of the NFL, NBA, WWE, UFC, and NHL, I know that as of January 25, 2011, all of the aforementioned events were copyrighted, and that the copyright holders did not authorize their third party distribution over the Internet by Iilemi.com.

Captures of Infringing Content Via Iilemi.com

36. I have used the Iilemi.com website to stream illegal telecasts of sporting events and/or Pay-Per-View events. On or about the dates listed in the chart below, I personally clicked on links for the below-listed events on the Iilemi.com website, and streamed portions of the selected events in a manner that indicated that the entire event had been made available to users.

Date	League	Event Viewed	Duration of Captures
January 28, 2011	NBA	Knicks vs. Hawks	0 hr 05 min 50 sec 0 hr 06 min 33 sec 0 hr 06 min 40 sec 0 hr 05 min 28 sec
January 28, 2011	NBA	Nets vs. Pacers	0 hr 05 min 18 sec
January 28, 2011	NBA	Timberwolves vs. Jazz	0 hr 06 min 06 sec 0 hr 05 min 25 sec 0 hr 02 min 57 sec

Date	League	Event Viewed	Duration of Captures
January 28, 2011	WWE	Friday Night Smackdown	0 hr 06 min 09 sec 0 hr 02 min 49 sec 0 hr 06 min 06 sec
January 29, 2011	NBA	Celtics vs. Suns	0 hr 05 min 40 sec 0 hr 07 min 25 sec 0 hr 07 min 56 sec 0 hr 06 min 20 sec

37. Based on my conversations with representatives of the NBA and WWE, I know that as of January 29, 2011, all of the aforementioned events were copyrighted, and that the copyright holders did not authorize their third party distribution over the Internet by Iilemi.com.

Captures of Infringing Content Via Iilemii.com

38. I have used the Iilemii.com website to stream illegal telecasts of sporting events and/or Pay-Per-View events. On or about the dates listed in the chart below, I personally clicked on links for the below-listed events on the Iilemii.com website, and streamed portions of the selected events in a manner that indicated that the entire event had been made available to users.

Date	League	Event Viewed	Duration of Captures
January 28, 2011	NBA	Knicks vs. Hawks	0 hr 06 min 39 sec 0 hr 06 min 18 sec 0 hr 07 min 00 sec 0 hr 05 min 55 sec
January 28, 2011	NBA	Bucks vs. Raptors	0 hr 06 min 49 sec
January 28, 2011	NBA	Nets vs. Pacers	0 hr 05 min 43 sec
January 28, 2011	NBA	Timberwolves vs. Jazz	0 hr 06 min 06 sec 0 hr 05 min 42 sec 0 hr 03 min 00 sec

Date	League	Event Viewed	Duration of Captures
January 28, 2011	WWE	Friday Night Smackdown	0 hr 06 min 21 sec 0 hr 02 min 40 sec 0 hr 04 min 19 sec
January 29, 2011	NBA	Celtics vs. Suns	0 hr 06 min 02 sec 0 hr 07 min 48 sec 0 hr 07 min 09 sec 0 hr 07 min 00 sec

39. Based on my conversations with representatives of the NBA and WWE, I know that as of January 29, 2011, all of the aforementioned events were copyrighted, and that the copyright holders did not authorize their third party distribution over the Internet by Iilemii.com.

The Rojadirecta.org and Rojadirecta.com Websites

40. Based on my review of webpages that are available at the Rojadirecta.org website, I have learned the following:

a. When an Internet user accesses either the Rojadirecta.org website or the Rojadirecta.com website, that user is directed to a main page, which is the same for either of the URLs and which carry the same IP address. The only difference in the main page is that the URL will either display "Rojadirecta.org" or "Rojadirecta.com" in the address bar, depending solely on which name the user typed to access the website (hereafter, the website will be referred to as "Rojadirecta"). Rojadirecta is a "linking" website. The website provides links to daily live sporting events and Pay-Per-View events, as well as downloadable sporting events or Pay-

Per-View events that were previously aired. The homepage displays three general categories of links that may be employed for viewing: (1) "Today On Internet TV"; (2) "Download Last Full Matches"; and (3) "Last Video Highlights." Links for daily sporting events are displayed under the "Today On Internet TV" category header. (A copy of the Rojadirecta homepage as it appeared on or about January 31, 2011 is attached as Exhibit F).

b. The links displayed for various live sporting events and Pay-Per-View events change on a daily basis. The links for sporting events are added as the day progresses and an event's starting time draws closer. The sporting events and their starting times correspond to individual leagues' official events and starting times.

c. After selecting an individual link, the user is taken to a new Rojadirecta.org window, which displays the selected program. Because the content is running on a live stream from another website, the selected show does not start at the beginning of the program, but rather runs from whatever point in the stream the show is presently at. Advertisements are periodically displayed at the bottom of the video during the live stream; these advertisements are separate and distinct from any commercials that may appear during the stream of the sporting event broadcast.

d. On or about January 12, 2011, at approximately 8:41 p.m., when agents participating in the investigation selected the link for "7:30 p.m. Hockey (NHL): Pittsburgh - Montreal," agents were given the option of several different links to choose for that individual sporting event. The links displayed the type of link, the name of the broadcasting station (e.g., "ESPN"), the language, and the type of Internet player. Once a specific link option was selected, the agents were brought to a new Rojadirecta webpage, and the live NHL broadcast of the Pittsburgh Penguins vs. Montreal Canadians hockey game began. The broadcast was shown in real time and was the same broadcast as the authorized broadcast of that same event. Based on my conversations with representatives of the NHL, I know that as of January 12, 2011, the NHL had not authorized third party distribution over the Internet of its broadcasts by Rojadirecta.

e. According to Alexa.com, as of on or about January 27, 2011, the Rojadirecta.org website was the 2,380th most popular website in the world and the 119th most popular website in Spain. According to Compete.com, the number of monthly unique visitors to the Rojadirecta.org website has increased from 44,623 in or about February 2010 to 96,986 in or about December 2010.

f. According to Alexa.com, as of on or about January 27, 2011, Rojadirecta.com was the 2,326th most popular website

in the world and the 109th most popular website in Spain. According to Compete.com, the number of monthly unique visitors to Rojadirecta.com has increased from 67,476 in or about February 2010 to 99,316 in or about November 2010.

g. Based on my review of public records, I know that the Rojadirecta.org and Rojadirecta.com websites are hosted on a computer assigned the IP address 67.212.67.250, which is hosted at an Internet Service Provider in Canada.

Captures of Infringing Content Via Rojadirecta.org

41. I have used the Rojadirecta.org website to stream illegal telecasts of sporting events and/or Pay-Per-View events. On or about the dates listed in the chart below, I personally clicked on links for the below-listed events on the Rojadirecta.org website, and streamed portions of the selected events in a manner that indicated that the entire event had been made available to users.

Date	League	Event Viewed	Duration of Captures
December 19, 2010	NFL	Jets vs. Steelers	0 hr 10 min 25 sec 0 hr 08 min 21 sec 0 hr 08 min 07 sec 0 hr 09 min 58 sec
December 19, 2010	WWE	Pay-Per-View TLC	0 hr 06 min 35 sec 0 hr 05 min 57 sec
December 20, 2010	NFL	Bears vs. Vikings	0 hr 06 min 34 sec 0 hr 09 min 47 sec 0 hr 04 min 36 sec 0 hr 08 min 29 sec
December 28, 2010	NBA	Knicks vs. Heat	0 hr 07 min 45 sec 0 hr 09 min 46 sec 0 hr 06 min 13 sec

Date	League	Event Viewed	Duration of Captures
December 28, 2010	NFL	Eagles vs. Vikings	0 hr 10 min 09 sec 0 hr 12 min 56 sec 0 hr 13 min 08 sec
December 29, 2010	NHL	Islanders vs. Penguins	0 hr 07 min 10 sec 0 hr 06 min 16 sec 0 hr 07 min 31 sec
January 3, 2011	NHL	Bruins vs. Maple Leafs	0 hr 10 min 19 sec 0 hr 07 min 09 sec 0 hr 06 min 20 sec
January 3, 2011	WWE	Monday Night Raw	0 hr 10 min 17 sec 0 hr 06 min 52 sec
January 4, 2011	NHL	Lightning vs. Capitals	0 hr 06 min 48 sec 0 hr 06 min 18 sec 0 hr 07 min 16 sec
January 4, 2011	NBA	Spurs vs. Knicks	0 hr 06 min 45 sec 0 hr 06 min 34 sec 0 hr 07 min 13 sec 0 hr 07 min 53 sec
January 5, 2011	NBA	Bucks vs. Magic	0 hr 06 min 48 sec 0 hr 07 min 48 sec 0 hr 06 min 11 sec 0 hr 08 min 06 sec

42. Based on my conversations with representatives of the NFL, NBA, NHL, and WWE, I know that as of January 25, 2011, all of the aforementioned events were copyrighted, and that the copyright holders did not authorize their third party distribution over the Internet by Rojadirecta.org.

Captures of Infringing Content Via Rojadirecta.com

43. I have used the Rojadirecta.com website to stream illegal telecasts of sporting events and/or Pay-Per-View events. On or about the dates listed in the chart below, I personally clicked on links for the below-listed events on Rojadirecta, and streamed portions of the selected events in a manner that

indicated that the entire event had been made available to users.

Date	League	Event Viewed	Duration of Captures
December 12, 2010	NFL	Bengals vs. Steelers	1 hr 32 min 54 sec 1 hr 04 min 07 sec
December 12, 2010	NFL	Dolphins vs. Jets	0 hr 08 min 43 sec
December 13, 2010	NFL	Giants vs. Vikings	0 hr 17 min 06 sec
December 14, 2010	NBA	Timberwolves vs. Warriors	0 hr 08 min 33 sec 0 hr 10 min 44 sec 0 hr 12 min 34 sec 0 hr 13 min 10 sec 0 hr 12 min 30 sec 0 hr 09 min 08 sec
December 14, 2010	NHL	Penguins vs. Flyers	0 hr 00 min 59 sec 0 hr 09 min 24 sec 0 hr 04 min 18 sec 0 hr 09 min 10 sec 0 hr 08 min 34 sec 0 hr 01 min 45 sec
December 15, 2010	NBA	Celtics vs. Knicks	0 hr 07 min 32 sec 0 hr 07 min 41 sec 0 hr 05 min 38 sec 0 hr 09 min 19 sec
December 15, 2010	NHL	Rangers vs. Penguins	0 hr 07 min 27 sec 0 hr 07 min 13 sec 0 hr 08 min 21 sec
December 16, 2010	NBA	Wizards vs. Nets	0 hr 05 min 25 sec 0 hr 06 min 27 sec 0 hr 05 min 10 sec
December 16, 2010	NFL	49ers vs. Chargers	0 hr 04 min 06 sec 0 hr 03 min 57 sec 0 hr 06 min 09 sec 0 hr 04 min 47 sec
December 16, 2010	NHL	Islanders vs. Ducks	0 hr 01 min 49 sec 0 hr 04 min 15 sec 0 hr 05 min 35 sec
December 19, 2010	WWE	Pay-Per-View TLC	0 hr 06 min 41 sec 0 hr 06 min 49 sec 0 hr 06 min 42 sec 0 hr 02 min 51 sec
January 1, 2011	UFC	Pay-Per-View 125	0 hr 04 min 43 sec 0 hr 06 min 17 sec 0 hr 06 min 36 sec 0 hr 05 min 25 sec

Date	League	Event Viewed	Duration of Captures
January 3, 2011	NHL	Bruins vs. Maple Leafs	0 hr 06 min 31 sec 0 hr 06 min 18 sec 0 hr 07 min 06 sec
January 3, 2011	WWE	Monday Night Raw	0 hr 10 min 40 sec 0 hr 08 min 15 sec
January 4, 2011	NHL	Lightning vs. Capitals	0 hr 06 min 43 sec 0 hr 06 min 00 sec 0 hr 06 min 07 sec
January 5, 2011	NBA	Bucks vs. Magic	0 hr 09 min 09 sec 0 hr 05 min 06 sec 0 hr 06 min 16 sec 0 hr 06 min 11 sec

44. Based on my conversations with representatives of NFL, NBA, NHL, WWE and UFC, I know that as of January 25, 2011, all of the aforementioned events were copyrighted, and that the copyright holders did not authorize their third party distribution over the Internet by Rojadirecta.com.

STATUTORY BASES FOR SEIZURE AND FORFEITURE

45. The statutory provisions pursuant to which the SUBJECT DOMAIN NAMES are subject to seizure and forfeiture are as follows:

a. Title 18 U.S.C. §§ 2323(a)(1)(A)-(B) subjects to forfeiture, inter alia, "[a]ny article, the making or trafficking of which is, prohibited under section . . . 2319 [or] . . . 2319B [or] . . . [a]ny property used, or intended to be used, in any manner or part to commit or facilitate the commission" of those offenses.

b. Title 18 U.S.C. § 2323(a)(2) further states that the provisions of chapter 46 relating to civil forfeitures,

which includes 18 U.S.C. § 981, shall extend to any seizure or civil forfeiture under Section 2323. Title 18 U.S.C. § 981(b)(1) states in relevant part that any property subject to forfeiture to the United States may be seized by the Attorney General.

c. The first statutory provision pursuant to which the SUBJECT DOMAIN NAMES are subject to seizure and forfeiture, Title 18, United States Code, Section 2319(a), provides that, "[a]ny person who violates section 506(a) (relating to criminal offenses) of title 17" is guilty of a crime. Title 17, United States Code, Section 506(a) states, in relevant part, the following:

Any person who willfully infringes a copyright shall be punished as provided under section 2319 of title 18, if the infringement was committed--

(A) for purposes of commercial advantage or private financial gain;

(B) by the reproduction or distribution, including by electronic means, during any 180-day period, of 1 or more copies or phonorecords of 1 or more copyrighted works, which have a total retail value of more than \$1,000; or

(C) by the distribution of a work being prepared for commercial distribution, by making it available on a computer network accessible to members of the public, if such person knew or should have known that the work was intended for commercial distribution.

46. Here, there is probable cause to believe that the SUBJECT DOMAIN NAMES are subject to forfeiture because they have been used to commit and facilitate criminal copyright infringement and contain evidence of that crime.

47. By reason of the above, I respectfully request that the Court issue a seizure warrant pursuant to 18 U.S.C. § 981 for the SUBJECT DOMAIN NAMES.

SEIZURE AND FORFEITURE PROCEDURE

48. As detailed in Attachment A, upon execution of the seizure warrant, the registry for the ".net," and ".com," top-level domains, VeriSign, Inc., 487 East Middlefield Road, Mountain View, CA 94043 ("VeriSign"), and the registry for the .org top-level domain, The Public Interest Registry, 1775 Wiehle Avenue, Suite 200, Reston, VA 20190, in addition the administrator for the ".org" top-level domain, Afillas USA, Inc., Building 3, Suite 105, 300 Welsh Road, Horsham, PA 19044, shall be directed to restrain and lock the SUBJECT DOMAIN NAMES pending transfer of all right, title, and interest in the SUBJECT DOMAIN NAMES to the United States upon completion of forfeiture proceedings, to ensure that changes to the SUBJECT DOMAIN NAMES cannot be made absent court order or, if forfeited to the United States, without prior consultation with ICE.

49. In addition, upon seizure of the SUBJECT DOMAIN NAMES by ICE, VeriSign and The Public Interest Registry will be

directed to point the SUBJECT DOMAIN NAMES to a particular IP address, which will display a web page notifying users that the SUBJECT DOMAIN NAMES have been seized.

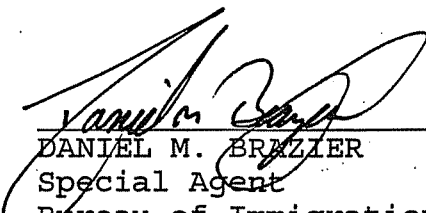
50. Registrars also maintain certain records relating to the owner of each domain name for which it is the registrar, including the SUBJECT DOMAIN NAMES (the "Domain Name Records"). Certain of these records are available to the public through a "Whois" lookup through a web browser, among other means. At the time the SUBJECT DOMAIN NAMES are seized, the relevant registrars will be directed to change the "Technical Contact" and "Administrative Contact" fields of the Domain Name Records for the SUBJECT DOMAIN NAMES to contact information relating to ICE to reflect the fact that the SUBJECT DOMAIN NAMES have been seized; and to change the name server fields of the Domain Name Records to effect the forgoing changes. All other fields will be changed so that they do not reflect any individual or entity.

51. Upon completion of forfeiture proceedings, all Domain Name Records for the SUBJECT DOMAIN NAMES maintained by the registrars will be changed to reflect the transfer of ownership to the United States.

CONCLUSION

52. Accordingly, a civil seizure warrant is authorized under 18 U.S.C. §§ 2323(a)(1)(A)-(B) and 981(b) because the SUBJECT DOMAIN NAMES are property used and intended to be used to commit and facilitate the commission of criminal infringement of copyrights.

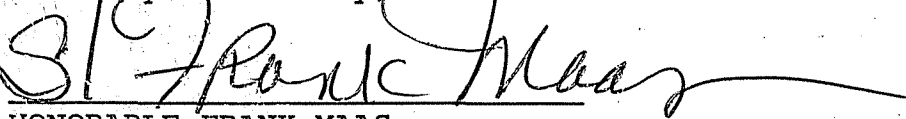
54. By reason of the above, I respectfully request that the Court issue a seizure warrant pursuant to 18 U.S.C. §§ 2323(a)(1)(A)-(B) and 981(b).


DANIEL M. BRAZIER

Special Agent

Bureau of Immigration and Customs
Enforcement

Sworn to before me this
31st day of January, 2011



HONORABLE FRANK MAAS

UNITED STATES MAGISTRATE JUDGE

In order to protect the ongoing investigation described herein, the Government respectfully requests that this Affidavit and attachments be filed under seal until further order of the Court.

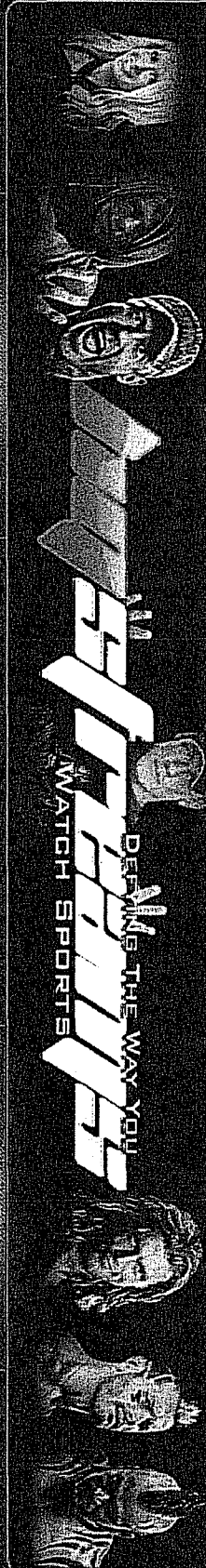
SO ORDERED

 JAN 31 2011

HONORABLE FRANK MAAS

UNITED STATES MAGISTRATE JUDGE

EXHIBIT A



FEEDBACK

PURCHASE ELITE



[Click Here To Donate To Watch HQ Elite Stream No Lag, No](#)

[Shutdowns!](#)

[Click Here To Watch Your Elite Stream After You have Paid !](#)

- CHANNEL 1
- CHANNEL 2
- CHANNEL 3
- CHANNEL 4
- CHANNEL 5
- CHANNEL 6
- CHANNEL 7
- CHANNEL 8
- CHANNEL 9
- CHANNEL 10
- ELITE

Justin.tv


















EXHIBIT B

ADDIE.NET

Live Sports  Live TV 

[Bookmark this website](#)

Mon January 31, 2011

-  [Everybody Loves Raymond](#)
-  [Family Guy](#)
-  [Frasier](#)
-  [King of Queens](#)
-  [South Park](#)
-  [The Big Bang Theory](#)
-  [The Office](#)
-  [Two and a Half Men](#)
-  [House](#)
-  [Movie Lounge](#)
-  [The Movie Channel](#)
-  [Top Gear](#)
-  [FOX News](#)
-  [MSNBC](#)
-  [CNBC](#)
-  [CNN](#)
-  [Poker Channel](#)

Bookmark this Website

Mon January 31, 2011

- ☐ [Everybody Loves Raymond](#)
- ☐ [Family Guy](#)
- ☐ [Frasier](#)
- ☐ [King of Queens](#)
- ☐ [South Park](#)
- ☐ [The Big Bang Theory](#)
- ☐ [The Office](#)
- ☐ [Two and a Half Men](#)
- ☐ [House](#)
- ☐ [Movie Lounge](#)
- ☐ [The Movie Channel](#)
- ☐ [Top Gear](#)
- ☐ [FOX News](#)
- ☐ [MSNBC](#)
- ☐ [CNBC](#)
- ☐ [CNN](#)
- ☐ [Poker Channel](#)
- ☐ [ESPN](#)
- ☐ [WWE Royal Rumble](#)
- ☐ [IFK Göteborg vs Karpas](#)
- ☐ [Women - West Virginia vs DePaul](#)
- ☐ [Georgia vs Louisiana State](#)

16:00 CET
22:00 CET
23:00 CET

Watch TV Online for Free

EXHIBIT C

FIRST ROW

ADMIT ONE

Forum

PLAY THE ORIGINAL

THE

FSH 1000

bet365

SUNDERLAND

5:50

WEDNESDAY
05145

CHELSEA

1:66

Attention: Click 'Refresh Links' to update streams and menu information

Refresh Links

三ノ

In this section you can see football Live and Free. Click on the match to view links.

00:00 5kySports News Live

FREE!
CREATE YOUR ZWINKY!



I NEED A WAY
TO HELP HIM.

99

Share

bet365 WEDNESDAY 09:45	ARSENAL	1.40
	DRAW	3.50
	EVERTON	8.50

Website Clock : 12:36:26 GMT-05:00

Attention: Click 'Refresh Links' to update streams and menu information

Refresh Links

[FOOTBALL](#)
[AM. FOOTBALL](#)
[BASKETBALL](#)
[ICE HOCKEY](#)
[BOXING • WWE • UFC](#)
[TENNIS](#)
[OTHER](#)
[MOTOSPORT](#)
[TV](#)

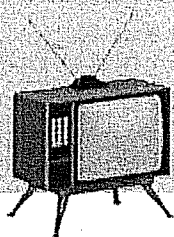
In this section you can see basketball Live and Free. Click on the match to view links.

	00:00 ESPN
	00:00 NBA Network
	19:01 Indiana Pacers vs Toronto Raptors
	19:01 New Jersey Nets vs Denver Nuggets
	19:30 Miami Heat vs Cleveland Cavaliers
	20:00 Memphis Grizzlies vs Orlando Magic
	20:30 Dallas Mavericks vs Washington Wizards
	21:00 Utah Jazz vs Charlotte Bobcats
	22:30 Los Angeles Clippers vs Milwaukee Bucks

AT&T lets you call
from the U.S. to
more countries
worldwide
for just pennies.



EXHIBIT D



Channelsurfing.net



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UPDATE

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TEEBBLITZ | **38K**

Scroll down for a list of todays events!

NEW Release DVD Movies!

Need to contact us? [CLICK HERE](#)



La Liga - Racing Santander vs Valencia CF 3:00PM EST 1/31



NCAA Basketball - Maryland-Eastern Shore at Hampton 7:00PM EST 1/31



NCAA Basketball - Louisville at Georgetown 7:00PM EST 1/31



NBA - Cleveland at Orlando 7:00PM EST 1/31



NBA - Denver at Philadelphia 7:00PM EST 1/31



NBA - Cleveland at Miami 7:30PM EST 1/31



NBA - Orlando at Memphis 8:00PM EST 1/31



How I Met Your Mother 8:00PM EST 1/31



Chuck 8:00PM EST 1/31



EXHIBIT E

ILEMI.COM

LIVE SPORTS FREE

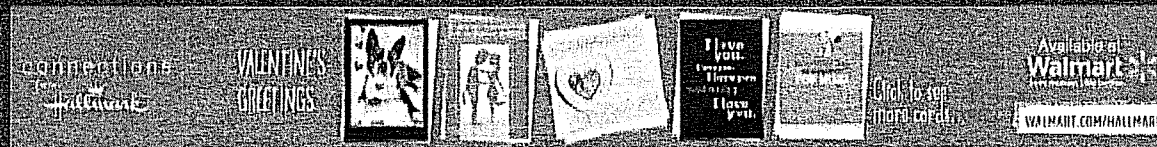
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[Live TV](#)

[Live Scores](#)

[Contact us](#)

[Live Sports](#)



[+ share](#) 8974

Mon 31 January 2011

	Movie channel
	Family Guy
	Canal de Peliculas
	ESPN
	ESPN Deportes
	The Office
	House
	MSNBC

connections
from
Hallmark

VALENTINE'S
GREETINGS

f. Article 8974

Mon 31 January 2011


	Movie channel
	Family Guy
	Canal de Peliculas
	ESPN
	ESPN Deportes
	The Office
	House
	MSNBC
	South Park
	Telefe
	Poker Channel
14:30 CET	Universitatea Cluj vs Gyeongnam FC
15:00 CET	World Snooker Shoot-Out
19:00 CET	OGC Nice vs FC Sochaux
19:00 CET	FC Augsburg vs VFL Bochum
19:00 CET	Frosinone Calcio vs Atalanta Bergamo
19:00 CET	Eskisehirspor vs Konyaspor
21:00 CET	Racing Santander vs Valencia CF
21:00 CET	Racing Santander vs Valencia CF
22:50 CET	Uruguay U20 vs Colombia U20

connections
from
HallmarkVALENTINE'S
GREETINGS

Click to see more cards.

Available at

EXHIBIT F



ROJADIRECTA


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Today on Internet TV

UTC/GMT+5 24H AM/PM 12:39:39pm

Real Racing Santander

2:45pm Serie B: Frosinone Calcio - Atalanta
3:00pm Tennis (ATP Santiago): Movistar Open 2011 (3:00pm-10:00pm)
3:00pm Friendly: OB Odense - Helsingborg IF
3:00pm La Liga: Real Racing Santander - Valencia CF
4:50pm Sudamericano sub20: Uruguay - Colombia
5:30pm Campeonato Mineiro (BRA): Democrata - America Teofilo Otoni
5:30pm Campeonato Pernambucano (BRA): Sport Club do Recife - Vitoria das Tabocas
7:00pm Sudamericano sub20: Argentina - Ecuador
7:00pm Basket (NBA): Toronto - Indiana
7:00pm Basket (NBA): Denver - New Jersey
7:30pm Basket (NBA): Cleveland - Miami
8:00pm Basket (NBA): Orlando - Memphis
8:30pm Basket (NBA): Washington - Dallas
9:00pm Basket (NBA): Charlotte - Utah
9:00pm Wrestling (WWE): Raw (9:00pm-11:30pm)
9:10pm Sudamericano sub20: Chile - Brazil
10:30pm Basket (NBA): Milwaukee - LA Clippers



Download last full matches

[FUTBOL 2A\(Liga Adelante\) Tem. 2010-11 Jor. 22f...](#)
[VOLEIBOL Superliga Masculina J14: Cajasol Juva...](#)
[FUTBOL Liga BBVA J21: RCD Espanyol - Villarrea...](#)
[Top Gear S16 E02 - Episode 2](#)
[NHL 2010-2011 / NHL 58th All Star Game - 2011/...](#)
[FA Cup Highlights Round4 \(30/01/11\)](#)
[BALONCESTO Copa Principe FINAL: Blu:sens Monbu...](#)

Last video highlights

[España La Liga:Goles Jornada 21 Alls Goals f2...](#)
[Brasil Campeonato Carioca - Vasco da Gama - Fl...](#)
[Brasil Campeonato Gaucho - Grêmio - Internacio...](#)
[México 1a División :: U.N.A.M. vs Monterrey](#)
[Argentina Amistoso: Chacarita Jrs - Argentinos...](#)
[Handball - IHF Men's World Championship - Fina...](#)
[Handball - IHF Men's World Championship-Bronze...](#)
[Amistoso Internacional: Atl. Nacional - Racing...](#)
[Torneo de Verano: Boca Juniors vs San Lorenzo ...](#)
[España La Liga: Espanyol-Villarreal 30/01/11](#)
[Friendly: Austria Vienna - Hajduk Split 29-01-...](#)
[Italy,Serie A:Juventus-Udinese f30/01/2011f](#)

ATTACHMENT A

I. Seizure Procedure

A. The seizure warrant will be presented in person or transmitted via facsimile or email to personnel of the domain name registries listed in section II (the "Subject Registries") and the domain name registrars listed in section III (the "Subject Registrars"). The Subject Registries will be directed, for the domain names listed in section IV ("Subject Domain Names") for which they serve as the top-level domain registry, to make any changes necessary to restrain and lock the Subject Domain Names pending transfer of all rights, title, and interest in the Subject Domain Names to the United States upon completion of forfeiture proceedings. The Subject Registrars will be directed, for the Subject Domain Names for which they serve as registrars, to make any changes necessary to reflect the seizure of the Subject Domain Names to any records, databases, tables, or documents that are used by the Subject Registrars to identify the owner of the Subject Domain Names.

B. Upon seizure of the Subject Domain Names, the Subject Registries and Subject Registrars will be directed to point the Subject Domain Names to IP address 74.81.170.109 (for "ns1.<domain>" name server fields) and 74.81.170.108 (for "ns2.<domain>" name server fields), at which the Government will display a web page with the following notice:

This domain name has been seized by ICE - Homeland Security Investigations, Special Agent in Charge, New York Office, in accordance with a seizure warrant obtained by the United States Attorney's Office for the Southern District of New York and issued pursuant to 18 U.S.C. §§ 981 and 2323 by the United States District Court for the Southern District of New York.

It is unlawful to reproduce or distribute copyrighted material, such as movies, music, software or games, without authorization. Individuals who willfully reproduce or distribute copyrighted material, without authorization, risk criminal prosecution under 18 U.S.C. § 2319. First-time offenders convicted of a criminal felony copyright law will face up to five years in federal prison, restitution, forfeiture and fine.

C. The Subject Registries and the Subject Registrars are directed to take all steps necessary to lock the Subject Domain Names at the registry level to ensure that changes to the Subject Domain Names cannot be made absent court order or, if forfeited to the United States, without prior consultation with The Department of Homeland Security, U.S. Immigration and Customs Enforcement - Homeland Security Investigations.

D. Upon seizure of the Subject Domain Names, any records, databases, tables, or documents that are used by the Subject Registries or the Subject Registrars to identify the owner of the Subject Domain Names shall be modified by the Subject Registries and Subject Registrars to reflect the seizure of the Subject Domain Names. These changes relate to the following records, if they exist:

1. The "Technical Contact" and "Administrative Contact" fields will reflect the following information:

- a. Name: Department of Homeland Security,
Immigration and Customs
Enforcement
- b. Address: 801 I St., N.W., Suite 700,
Washington, DC, 20536
- c. Country: USA
- d. Telephone: (202) 732-2000
- e. Email: ICEcio@fins3.dhs.gov
- f. Fax: (202) 732-2005

2. All name server fields will be changed to reflect "ns1.<domain>" and "ns2.<domain>", i.e.:

"ns1.HQ-STREAMS.COM" and/or "HQ-STREAMS.COM"

"ns1.HQ-STREAMS.NET" and/or "HQ-STREAMS.NET"

"ns1.ATDHE.NET" and/or "ns2.ATDHE.NET"

"ns1.FIRSTROW.NET" and/or "ns2.FIRSTROW.NET"

"ns1.CHANNELSURFING.NET" and/or "ns2.CHANNELSURFING.NET"

"ns1.ILEMI.COM" and/or "ns2.ILEMI.COM"

"ns1.IILEMI.COM" and/or "ns2.IILEMI.COM"

"ns1.IILEMII.COM" and/or "ns2.IILEMII.COM"

"ns1.ROJADIRECTA.ORG" and/or "ROJADIRECTA.ORG"

"ns1.ROJADIRECTA.COM" and/or "ns2.ROJADIRECTA.COM"

3. Any remaining fields will be changed so that they do not reflect any individual or entity.

E. The Subject Registries and Subject Registrars shall take any steps required to propagate the changes detailed in Section D to any applicable DNS servers.

II. Subject Registries

VeriSign, Inc.
487 East Middlefield Road
Mountain View, California 94043

The Public Interest Registry
1775 Wiehle Avenue, Suite 200
Reston, Virginia 20190

Afillas USA, Inc.
Building 3, Suite 105
300 Welsh Road
Horsham, Pennsylvania 19044

III. Subject Registrars

Directi Internet Solutions Pvt. Ltd.
d/b/a PublicDomainRegistry.com
14525 SW Millikan #48732
Beaverton, Oregon 97005

GoDaddy.com Inc.
14455 N. Hayden Road, Suite 219
Scottsdale, Arizona 85260

eNom, Inc.
15801 NE 24th Street
Bellevue, Washington 98008

IV. Subject Domain Names

HQ-STREAMS.COM,
HQ-STREAMS.NET,
ATDHE.NET,
FIRSTROW.NET,
CHANNELSURFING.NET,
ILEMI.COM,
IILEMI.COM,
IILEMII.COM,
ROJADIRECTA.ORG, and
ROJADIRECTA.COM